

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)
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This document relates to: *Estate of John P. O’Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, 04-cv-1922 (GBD) (SN) (S.D.N.Y.)
 All Actions

**DECLARATION OF JERRY S. GOLDMAN, ESQ.
IN SUPPORT OF PLAINTIFFS’ OPPOSITION TO MOTION**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for the named Plaintiffs the Estate of John P. O’Neill, Sr., John P. O’Neill, Jr., Christine O’Neill, Carol O’Neill, the Estate of Dorothy O’Neill, and the Estate of John F. O’Neill in the above-captioned action, in their individual capacities as putative class representatives, as well as several thousand individuals, in both their individual capacities as family members (spouses, children, parents, siblings) of those who lost their lives (as well as personal representatives of family members who were alive on 9/11/2001 who subsequently passed away, and as personal representatives of the estates of over 400 individuals who perished on 9/11.(“Clients” and with the putative class “O’Neill Plaintiffs”).¹ I am familiar with the facts and circumstances of this case and the rest of the multi-district litigation, I am a member of the Plaintiffs Executive Committee, and am admitted to practice in this Court.

¹ I also represent the personal representative of a person who died as a result of injuries suffered on 9/11 (cancer) and an individual who was serious injured on 9/11 who is also the son of the decedent, John Patrick O’Neill.

2. At approximately 5:00 P.M. on March 30, 2020, I arranged to send to as many of my Clients for whom we had an email address, an electronic communication. Accompanying that communication was a copy of a Declaration, attached hereto and incorporated here as Exhibit “A” (“Declaration”). I understand that such communication was received by my clients at around 7:00 PM, EST.

3. From the time of their receipt, until 5:00 P.M (EST) on this date, we received a large number of electronic responses from my Clients to that communications, with either signed copies of the Declaration, or an email indicating that we should advise the Court that they have authorized us to sign/tender it on their behalf. At 9:00 AM today, we had over 700 responses and I arranged for a team of over 4 paralegals and associates to process them.

4. Attached hereto and incorporated herein, as Exhibit “B” is a listing of those approximately 809 Clients who have authorized us, in writing, to tender the Declaration as signed or have been physically signed the Declaration, which have been processed by 5:00 PM today. We intend to keep processing the backlog (which is presently approximately 175) and I will file an updated/supplemental declaration tomorrow.

Dated: March 31, 2020
New York, NY

/s/ Jerry S. Goldman

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